

SEALED**FILED**

NOV 20 2019

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISIONCLERK, U.S. DISTRICT CLERK
WESTERN DISTRICT OF TEXAS
BY _____ DEPUTY**SA 19 CR 0855 XR**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Mario Reyes-Alvarez, a.k.a. Mario Borrado (1)
Manuel Balderas Mejia, a.k.a. Manolillo (2)
Raul Jesus Hernandez, a.k.a. Guero (3)
Edgar Otoniel Corozo-Barrera, a.k.a. Edgar Otoniel
 Melchor-Corozo, Payaso (4)
Paulin Balderas Mejia, a.k.a. Pau (5)
Edgar De Jesus Trejo Acevedo, a.k.a. Trejo (6)
Carlos Iran Temix-Silverio, a.k.a. Chilango (7)
Carlos Enrique Munoz-Chocojay, a.k.a. Calin (8)
Eliseo Garcia-Aguirre, a.k.a. Eliseo (9)
Elias Alaniz, a.k.a. Frijol (10)
Jessica Elizabeth Castillo, (11)
Daniel Rodriguez, a.k.a. Chino, (12)

Defendants,

INDICTMENT

[Violations: **COUNT 1**: 8 U.S.C. §1324(a)(1)(v)(I), (A)(i),(ii),(iii),(iv), & (B)(i),(iii).; Conspiracy to Bring in, Transport, and Harbor Aliens for Financial Gain and placing in jeopardy the life of persons;
COUNTS 2,3,5,6,7: 8 U.S.C. § 1324(a)(1) (A)(ii); (B)(i) Aiding and Abetting the Transportation of Aliens for Gain; **COUNTS 4 & 8**: 8 U.S.C. § 1324(a)(1) (A)(ii); (iii); B (i) Aiding and Abetting the Transportation and Harboring of Aliens for Gain.]

THE GRAND JURY CHARGES:

COUNT I

[8 USC § 1324(a)(1)(v)(I), (A)(i),(ii),(iii),(iv), & (B)(i),(iii).]

1. That from on or about October 2018 until November of 2019, in the Western District of Texas,

and elsewhere in the jurisdiction of this court, the Defendants,

Mario Reyes-Alvarez, a.k.a. Mario Borrado (1)
Manuel Balderas Mejia, a.k.a. Manolillo (2)
Raul Jesus Hernandez, a.k.a. Guero (3)
Edgar Otoniel Corozo-Barrera, a.k.a. Edgar Otoniel Melchor-Corozo, Payaso (4)
Paulin Balderas Mejia, a.k.a. Pau (5)
Edgar De Jesus Trejo Acevedo, a.k.a. Trejo (6)
Carlos Iran Temix-Silverio, a.k.a. Chilango (7)
Carlos Enrique Munoz-Chocojay, a.k.a. Calin (8)
Eliseo Garcia-Aguirre, a.k.a. Eliseo (9)

Elias Alaniz, a.k.a. Frijol (10)
Jessica Elizabeth Castillo, (11)
Daniel Rodriguez, a.k.a. Chino, (12)

and others known and unknown to the Grand Jury, did, for the purpose of commercial advantage and private financial gain, conspire, combine, and confederate with each other and with others known and unknown to commit offenses against the United States, namely the Defendants and others conspired to:

a. Transport and move and attempt to transport and move aliens within the United States by means of transportation and otherwise, while knowing and in reckless disregard of the fact that the aliens had come to, entered, and remained in the United States in violation of law, and for the purpose of financial gain, in violation of Title 8, United States Code, Section 1324(a) (1) (A) (ii);

b. To conceal, harbor, and shield and to attempt to conceal, harbor and shield from detection, aliens who had come to, entered, and remained in the United States in violation of law, while knowing and in reckless disregard of the fact that the aliens had come to, entered, and remained in the United States in violation of law, and for the purpose of financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii); and

c. To encourage and induce aliens to come to, enter, and reside in the United States, while knowing and in reckless disregard of the fact that such coming to, entry, and residence was in violation of law, and for the purpose of financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv);

2. The Defendants intended to profit from smuggling aliens into the United States, by providing transportation and places to harbor the aliens, by concealing and shielding the aliens from law enforcement, and by compelling the aliens, their families, and their acquaintances to pay and to agree to pay the Defendants for such services. The Defendants committed the offense for the purpose

of private financial gain, and, during which and in relation to this offense, Defendants placed in jeopardy the life of persons, by transporting them in the beds of pickup trucks, under tarps, and by walking them through the brush in hot weather which endangered the health and welfare of the persons they were smuggling, all in violation of Title 8, United States Code, Section 1324(a)(1)(v)(I), (A)(i),(ii),(iii),(iv), & (B)(i),(iii).

COUNT II

[8 U.S.C. § 1324(a) (1) (A) (ii) & (B) (i)]

That on or about July 22, 2019 and continuing until July 24, 2019, in the Western District of Texas, and elsewhere within the jurisdiction of the court, the Defendants,

Manuel Balderas Mejia, a.k.a. Manolillo (2)

Edgar Otoniel Corozo-Barrera, a.k.a.

Edgar Otoniel Melchor-Corozo, Payaso (4)

Carlos Iran Temix-Silverio, a.k.a. Chilango (7)

and others known and unknown, aided and abetted by each other, knowing and in reckless disregard of the fact that undocumented aliens had come to, entered and remained in the United States in violation of law, did transport and move, and attempt to transport and move those aliens for the purpose of commercial advantage and private financial gain, and all in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) & (B)(i).

COUNT III

[8 U.S.C. § 1324(a) (1) (A) (ii) & (B) (i)]

That on or about August 1, 2019 and continuing until August 2, 2019, in the Western District of Texas, and elsewhere within the jurisdiction of the court, the Defendants,

Manuel Balderas Mejia, a.k.a. Manolillo (2),

Raul Jesus Hernandez, a.k.a. Guero (3), and

Edgar Otoniel Corozo-Barrera, a.k.a.

Edgar Otoniel Melchor-Corozo, Payaso (4);

and others known and unknown, aided and abetted by each other, knowing and in reckless disregard of the fact that undocumented aliens had come to, entered and remained in the United States in violation of law, did transport and move, and attempt to transport and move those aliens for the purpose of commercial advantage and private financial gain, and all in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) & (B)(i).

COUNT IV

[8 U.S.C. § 1324(a) (1) (A) (ii), (iii) & (B) (i)]

That on or about August 2, 2019 and continuing until August 5, 2019, in the Western District of Texas, and elsewhere within the jurisdiction of the court, the Defendants,

Manuel Balderas Mejia, a.k.a. Manolillo (2),
Raul Jesus Hernandez, a.k.a. Guero (3), and,
Jessica Elizabeth Castillo, (11);

and others known and unknown, aided and abetted by each other, knowing and in reckless disregard of the fact that undocumented aliens had come to, entered and remained in the United States in violation of law, did conceal, harbor and shield from detection and attempt to conceal, harbor and shield from detection one alien: in a building, or other places, and by means of transportation; and the defendants also did transport and move, and attempt to transport and move those aliens for the purpose of commercial advantage and private financial gain, and all in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii),(iii), & (B)(i).

COUNT V

[8 U.S.C. § 1324(a) (1) (A) (ii) & (B) (i)]

That on or about August 6, 2019, in the Western District of Texas, and elsewhere within the jurisdiction of the court, the Defendants,

Manuel Balderas Mejia, a.k.a. Manolillo (2),
Edgar Otoniel Corozo-Barrera, a.k.a.
Edgar Otoniel Melchor-Corozo, Payaso (4), and,
Paulin Balderas Mejia, a.k.a. Pau (5);

and others known and unknown, aided and abetted by each other, knowing and in reckless disregard of the fact that undocumented aliens had come to, entered and remained in the United States in violation of law, did transport and move, and attempt to transport and move those aliens for the purpose of commercial advantage and private financial gain, and all in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) & (B)(i).

COUNT VI

[8 U.S.C. § 1324(a) (1) (A) (ii) & (B) (i)]

That on or about August 10, 2019 and continuing until August 16, 2019, in the Western District of Texas, and elsewhere within the jurisdiction of the court, the Defendants,

Manuel Balderas Mejia, a.k.a. Manolillo (2),
Edgar Otoniel Corozo-Barrera, a.k.a.
Edgar Otoniel Melchor-Corozo, Payaso (4),
Carlos Enrique Munoz-Chocojay, a.k.a. Calin (8),
Elias Alaniz, a.k.a. Frijol (10), and
Daniel Rodriguez, a.k.a. Chino, (12);

and others known and unknown, aided and abetted by each other, knowing and in reckless disregard of the fact that undocumented aliens had come to, entered and remained in the United States in violation of law, did transport and move, and attempt to transport and move those aliens for the purpose of commercial advantage and private financial gain, and all in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) & (B)(i).

COUNT VII

[8 U.S.C. § 1324(a) (1) (A) (ii) & (B) (i)]

That on or about August 22, 2019, in the Western District of Texas, and elsewhere within the

jurisdiction of the court, the Defendants,

Manuel Balderas Mejia, a.k.a. Manolillo (2),
Edgar Otoniel Corozo-Barrera, a.k.a.
Edgar Otoniel Melchor-Corozo, Payaso (4), and,
Eliseo Garcia-Aguirre, a.k.a. Eliseo (9);

and others known and unknown, aided and abetted by each other, knowing and in reckless disregard of the fact that undocumented aliens had come to, entered and remained in the United States in violation of law, did transport and move, and attempt to transport and move those aliens for the purpose of commercial advantage and private financial gain, and all in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) & (B)(i).

COUNT VIII

[8 U.S.C. § 1324(a) (1) (A) (ii), (iii) & (B) (i)]


That on or about October 4, 2019, in the Western District of Texas, and elsewhere within the jurisdiction of the court, the Defendants,

Manuel Balderas Mejia, a.k.a. Manolillo (2),
Raul Jesus Hernandez, a.k.a. Guero (3),
Paulin Balderas Mejia, a.k.a. Pau (5),
Edgar De Jesus Trejo Acevedo, a.k.a. Trejo (6),

and others known and unknown, aided and abetted by each other, knowing and in reckless disregard of the fact that undocumented aliens had come to, entered and remained in the United States in violation of law, did conceal, harbor and shield from detection and attempt to conceal, harbor and shield from detection one alien: in a building, or other places, and by means of transportation; and the defendants also did transport and move, and attempt to transport and move those aliens for the purpose of

commercial advantage and private financial gain, and all in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii),(iii), & (B)(i).

A TRUE BILL.


FOREPERSON OF THE GRAND JURY

JOHN F. BASH
United States Attorney

BY:


MATTHEW LATHROP
Assistant United States Attorney